

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

ISABELLA SNEED,

Plaintiff,

-vs-

Case No. CIV-22-31-R

INDEPENDENT SCHOOL DISTRICT
NO. 16 OF PAYNE COUNTY,
OKLAHOMA, a/k/a STILLWATER
PUBLIC SCHOOL DISTRICT,
a/k/a STILLWATER
INDEPENDENT SCHOOL DISTRICT
NO. 16,

CONFIDENTIAL

Defendant.

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VIDEO DEPOSITION OF ISABELLA GRACE SNEED

TAKEN PURSUANT TO PROTECTIVE ORDER

TAKEN ON BEHALF OF THE DEFENDANT

TAKEN AT 701 SOUTH CINCINNATI AVENUE

TULSA, OKLAHOMA

NOVEMBER 1, 2022

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REPORTED BY: ASHLEY BALLARD, CSR



- 1 A. No.
- 2 Q. All right. So before I move off the spring, I just
3 want to ask: In your communications on Instagram
4 with Mr. Morejon, was there anything that went on by
5 way of him sending to you or you sending to him that
6 you would say was inappropriate? What I mean by
7 that is of a sexual nature in the spring of '18.
- 8 A. Yes, but it wasn't pictures. It was just him
9 saying things.
- 10 Q. Okay. Can you help me out? Like what -- what kind
11 of things?
- 12 A. He would want to meet up with me and just -- he
13 always fantasized things.
- 14 Q. Okay. So he would try to meet you in the spring of
15 '18?
- 16 A. Yes.
- 17 Q. And you were 14 years old. Obviously you weren't
18 driving.
- 19 A. Right.
- 20 Q. So how was he proposing that you guys meet up?
- 21 A. Couldn't tell you.
- 22 Q. So there were no details? It was just a generic
23 statement?
- 24 A. It was just like fantasizing it.
- 25 Q. Oh, okay. So not really trying to meet up, just

- 1 Mr. Morejon's class. So we've talked about sitting
2 behind his desk taking notes.
- 3 A. Yes.
- 4 Q. Talked about him doing the direct messaging. Is
5 there anything else that went on that we have not
6 discussed?
- 7 A. No.
- 8 Q. Okay. We've covered it all?
- 9 A. (Witness nods head up and down.)
- 10 Q. Okay. And just so I'm clear, had he -- he had
11 not -- he flirted -- or I don't want to use that
12 term, but he had talked about fantasizing about
13 meeting with you; correct?
- 14 A. Yes.
- 15 Q. Okay. And -- but he hadn't sent any pictures at
16 that time?
- 17 A. No.
- 18 Q. Had he asked you to send any pictures at that time?
- 19 A. Yes.
- 20 Q. Had you sent any pictures?
- 21 A. No.
- 22 Q. All right. And as far as what was going on between
23 you and Mr. Morejon, you hadn't told anybody?
- 24 A. No.
- 25 Q. Okay. Did you sometimes go behind his desk and

- 1 sleep?
- 2 A. Yes.
- 3 Q. Okay. So you weren't always just taking notes?
- 4 A. No.
- 5 Q. You would actually sleep back there?
- 6 A. Yes.
- 7 Q. Okay. And when you were in his class, did you --
- 8 was there parts of the school year where you weren't
- 9 turning in your work?
- 10 A. Yes.
- 11 Q. And was he submitting grades for you --
- 12 A. Yes.
- 13 Q. -- even though you didn't turn in your work?
- 14 A. Yes.
- 15 Q. Okay. Did you tell anyone about that?
- 16 A. No.
- 17 Q. Okay. And as far as the '17-18 school year, you
- 18 didn't actually see anybody else being behind his
- 19 desk or any direct messaging with any other girls,
- 20 anything like that?
- 21 A. No.
- 22 Q. Okay. As far as you knew that year, you were the
- 23 only one?
- 24 A. No. I knew that they were sitting back there. I
- 25 had never physically seen it.

1 Q. Okay. So you knew that that year. And I'm sorry,
2 I misunderstood that. So Avery and Ella [sic], you
3 knew they were sitting back there; you just didn't
4 see it?

5 A. Right.

6 Q. Okay. Did you ever have any conversations that
7 school year with any Stillwater School District
8 employees about Mr. Morejon and any of his conduct?

9 A. No.

10 Q. Okay. Did anyone approach you and try to talk to
11 you that was an employee with Stillwater about
12 anything that was going on between you and
13 Mr. Morejon?

14 A. No.

15 Q. Okay. Did -- did he tell you to keep things a
16 secret?

17 A. Yes.

18 Q. Okay. So the summer between your eighth and ninth
19 grade year, Isabella, did you have any contact with
20 Mr. Morejon during the summer months?

21 A. Yes.

22 Q. Okay. How would you have contact with him during
23 the summer between eighth and ninth grade year?

24 A. The same. Instagram.

25 Q. The DM --

- 1 Q. Would you be around Mr. Morejon at school in your
2 ninth grade year?
- 3 A. Yes.
- 4 Q. How would you be around him?
- 5 A. Lunch --
- 6 Q. Okay.
- 7 A. -- and after school.
- 8 Q. All right. So --
- 9 A. And --
- 10 Q. Go ahead. I'm sorry.
- 11 A. Occasionally he would call me into his room,
12 because he had a planning period.
- 13 Q. Okay. So let's start with lunch. When you were in
14 junior high, would that be a lunch period for both
15 grades combined or would they do each grade
16 separately?
- 17 A. It was each grade separately.
- 18 Q. All right. So in ninth grade, you get -- the ninth
19 grade would have a designated lunch hour?
- 20 A. Right.
- 21 Q. And at some other point in time of the day eighth
22 grade would have a lunch hour?
- 23 A. Right.
- 24 Q. Okay. Was he still teaching eighth grade when you
25 were in the ninth grade?

- 1 A. Yes.
- 2 Q. Okay. So when you had your lunch hour, was he not
- 3 teaching class?
- 4 A. Yes.
- 5 Q. He was teaching class?
- 6 A. (Witness nods head up and down.)
- 7 Q. Okay. So there would be students in there?
- 8 A. Yes.
- 9 Q. Okay. And then you said you would sometimes see
- 10 him after school?
- 11 A. Yes.
- 12 Q. Would you go by his room after school? Is that how
- 13 you would see him?
- 14 A. Yes.
- 15 Q. All right. Did you have FFA or volleyball
- 16 obligations after school?
- 17 A. Not in junior high.
- 18 Q. Okay. So as far as volleyball or FFA
- 19 responsibilities, that would not be after school in
- 20 junior high?
- 21 A. Right. We would only have it like three times a
- 22 week, I think.
- 23 Q. Okay.
- 24 A. For volleyball.
- 25 Q. But would that be after school?

- 1 A. He would be in his classroom.
- 2 Q. Okay. would he be back behind his desk?
- 3 A. Yes.
- 4 Q. All right. And you would walk in after the school
- 5 day was over and what? what was going on in there?
- 6 Just talking?
- 7 A. Uh-huh.
- 8 Q. Okay. Anything inappropriate go on in that
- 9 classroom of a sexual nature?
- 10 A. At this time?
- 11 Q. Yeah, in the fall of 2018.
- 12 A. That's when he started touching my legs.
- 13 Q. Okay.
- 14 A. But other than that, no.
- 15 Q. Okay. well, we haven't talked about that, so let
- 16 me ask you about that. So when -- when during the
- 17 school day would this touching occur? was it always
- 18 the same part of the school day or different points
- 19 throughout the day?
- 20 A. Usually the same after school because there was
- 21 nobody in there.
- 22 Q. Okay. So after school you would go by to see him
- 23 and he would touch your legs?
- 24 A. Right.
- 25 Q. Okay. Can you explain to me how that would occur?

- 1 would you go over behind the desk? would you be --
- 2 A. Yes.
- 3 Q. -- sitting on the desk?
- 4 A. No.
- 5 Q. where were you in the classroom?
- 6 A. Sitting behind the desk.
- 7 Q. On the floor?
- 8 A. Yes.
- 9 Q. Okay. So you would come in after school, you would
- 10 go around behind his desk, and you would sit down on
- 11 the floor?
- 12 A. Right.
- 13 Q. And that -- he would then touch your legs?
- 14 A. Right.
- 15 Q. Okay. Was it on the outside or the inside of your
- 16 clothes?
- 17 A. Outside.
- 18 Q. All right. And would he pat you, squeeze you, rub
- 19 you, or just set his hand on your leg? what -- what
- 20 was the motion like?
- 21 A. All three.
- 22 Q. All three. Okay. Would he say anything when he
- 23 was doing this?
- 24 A. No, just normal talking.
- 25 Q. Okay. So sometimes he would pat your leg?

- 1 A. Right.
- 2 Q. Sometimes he would squeeze your leg?
- 3 A. Right.
- 4 Q. And sometimes he would rub his hand on your leg?
- 5 A. Right.
- 6 Q. Okay. Did he ever say anything inappropriate when
- 7 he was doing that?
- 8 A. No.
- 9 Q. Okay. To your knowledge, did anyone, that you were
- 10 aware of, observe Mr. Morejon touching your leg?
- 11 A. No.
- 12 Q. Okay. Did you tell anyone in the fall of 2018 that
- 13 Mr. Morejon touched your leg?
- 14 A. No.
- 15 Q. And Isabella, there's obviously different parts of
- 16 our leg, you know, calf, knee, thigh area. Where on
- 17 your leg was he touching you?
- 18 A. My thighs.
- 19 Q. Your thighs? Okay. Both thighs?
- 20 A. (Witness nods head up and down.)
- 21 Q. Okay. On top? On the sides?
- 22 A. Like inside and then --
- 23 Q. Inside your thigh?
- 24 A. -- on top.
- 25 Q. Okay. Anything else that happened - you said when

1 Schools, Isabella, that ever said anything after all
2 this came to light about Mr. Morejon, any employee
3 that said anything to you about that situation that
4 you thought was unprofessional or inappropriate?

5 A. No.

6 Q. Okay. Do you have any reason to believe that the
7 volleyball coach, Kyle, treated you any differently
8 because of what happened with Mr. Morejon?

9 A. Yes.

10 Q. Okay. Why do you believe that?

11 A. He wouldn't talk to me there -- before, we had --
12 we were pretty close, and then after, he wouldn't
13 say anything.

14 Q. Okay. So prior to this coming out with
15 Mr. Morejon, he would speak with you a lot?

16 A. Right.

17 Q. My understanding of what you're telling me?

18 A. Yes.

19 Q. Okay. And then after the situation with
20 Mr. Morejon came out, he would not talk to you?

21 A. Right.

22 Q. Okay. Did he ever tell you that was because of
23 Mr. Morejon?

24 A. No.

25 Q. Okay. So that's -- that's your opinion that's why;

1 Q. Everybody is social distancing?

2 A. I mean, sure.

3 Q. Right. I mean, it was a much different world than
4 the fall; right?

5 A. Right.

6 Q. Everyone is standoffish because of COVID; correct?

7 MR. BLAKEMORE: Object to form.

8 Q. (By Mr. Priddy) You're not going up and giving
9 high fives and giving your friends hugs. I mean,
10 all that -- the world is changed; correct?

11 A. Right.

12 MR. BLAKEMORE: Object to form.

13 Q. (By Mr. Priddy) Did anyone tell you they were
14 upset with you at Stillwater Public Schools because
15 of the report involving Mr. Morejon?

16 A. No.

17 Q. Did anyone tell you that they thought differently
18 of you because of the report of Mr. Morejon?

19 A. No.

20 Q. Have you, Isabella -- let me start with doctors
21 first. Have you gone and seen any doctors for any
22 type of medical care that you believe is related to
23 what happened with Mr. Morejon?

24 A. Mental health?

25 Q. No, just medical first.

1 A. Just medical?

2 Q. Let's talk about medical.

3 A. No.

4 Q. All right. Have you gone to any counselors -- so
5 now let's move on to what you said, mental health.
6 Have you gone to any counselors that you've sought
7 services from that you would say is a result of what
8 happened with Mr. Morejon?

9 A. Yes.

10 Q. Okay. And have you gone to more than one
11 counselor?

12 A. Yes.

13 Q. How many total counselors have you gone to?

14 A. Approximately possibly between five and seven.

15 Q. Five to seven counselors?

16 A. Yes.

17 Q. Okay.

18 MR. BLAKEMORE: And before you go any further,
19 I just want to designate any further testimony about
20 counseling as confidential under the protective
21 order.

22 MR. PRIDDY: Okay.

23 Q. (By Mr. Priddy) So -- and do you understand what
24 your attorney is saying, Isabella? We have done an
25 agreed protective order to keep your -- your private